

THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FEDERAL TRADE COMMISSION, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC., a corporation,

Defendant.

CASE NO.: 2:23-cv-01495-JHC

STIPULATED MOTION AND
[PROPOSED] ORDER TO
TEMPORARILY SEAL EXHIBIT
B TO PLAINTIFFS' MOTION TO
COMPEL PRODUCTION OF
DOCUMENTS RELATED TO
SPOILIATION

NOTE ON MOTION CALENDAR:
May 23, 2024

The parties, by and through their attorneys of record, respectfully request that the Court enter the proposed order set forth below regarding Exhibit B to Plaintiffs' Motion to Compel Production of Documents Related to Spoliation.

In support of this request, the parties represent the following to the Court:

1. On April 25, 2024, Plaintiffs filed a Motion to Compel Production of Documents Related to Spoliation (Dkt. #198).

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600 Pennsylvania Avenue, NW
Washington, DC 20580
(202) 326-2222

2. Exhibit B to that Motion is a log of Signal screenshots for certain Amazon executives who were custodians in Plaintiffs' pre-Complaint investigation (Dkt. #201).
3. At Amazon's request, Plaintiffs filed Exhibit B under seal, *see* Bolles Decl. ¶ 7, Dkt. #200, and Amazon is requesting that the Court permanently seal Exhibit B, (Dkt. #221 at 3).
4. Plaintiffs are now filing another version of Exhibit B marked with proposed redactions in connection with Plaintiffs' Reply Regarding Plaintiffs' Motion to Seal and Plaintiffs' Response to Amazon's Motion to Seal.
5. Plaintiffs provided their redactions proposal to Amazon on May 22, 2024. In lieu of initiating new motions practice on sealing, Amazon requests to file a sur-reply addressing Plaintiffs' proposal. Plaintiffs do not oppose Amazon's request to file a sur-reply.
6. The parties stipulate as follows, subject to Court approval, and jointly request that the Court enter the following Order approving this Stipulation.
 - a. The version of Exhibit B filed with the Declaration of Kara King in Support of Plaintiffs' Reply Regarding Plaintiffs' Motion to Seal and Plaintiffs' Response to Amazon's Motion to Seal is temporarily sealed, pending the Court's decision on Plaintiffs' Motion to Seal (Dkt. # 199).
 - b. Amazon may file a sur-reply addressing Plaintiffs' redaction proposal for Exhibit B by Friday, May 31, 2024.

1 Stipulated to and respectfully submitted this 23rd day of May, 2024, by:

2 s/ Kara King

SUSAN A. MUSSER (DC Bar # 1531486)

3 EDWARD H. TAKASHIMA (DC Bar #
1001641)

4 EMILY K. BOLLES (NY Reg. # 5408703)

KARA KING (DC Bar # 90004509)

5 ERIC ZEPP (NY Reg. #5538491)

Federal Trade Commission

6 600 Pennsylvania Avenue, NW

Washington, DC 20580

7 Tel.: (202) 326-2122 (Musser)

(202) 326-2464 (Takashima)

8 Email: smusser@ftc.gov

etakashima@ftc.gov

9 ebolles@ftc.gov

kking@ftc.gov

10 ezepp@ftc.gov

11 *Attorneys for Plaintiff Federal Trade*
12 *Commission*

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24 STIPULATED MOTION AND [PROPOSED]
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600 Pennsylvania Avenue, NW
Washington, DC 20580
(202) 326-2222

s/ Michael Jo

Michael Jo (admitted *pro hac vice*)
 Assistant Attorney General, Antitrust Bureau
 New York State Office of the Attorney
 General
 28 Liberty Street
 New York, NY 10005
 Telephone: (212) 416-6537
 Email: Michael.Jo@ag.ny.gov
Counsel for Plaintiff State of New York

s/ Rahul A. Darwar

Rahul A. Darwar (admitted *pro hac vice*)
 Assistant Attorney General
 Office of the Attorney General of Connecticut
 165 Capitol Avenue
 Hartford, CT 06016
 Telephone: (860) 808-5030
 Email: Rahul.Darwar@ct.gov
Counsel for Plaintiff State of Connecticut

s/ Alexandra C. Sosnowski

Alexandra C. Sosnowski (admitted *pro hac vice*)
 Assistant Attorney General
 Consumer Protection and Antitrust Bureau
 New Hampshire Department of Justice
 Office of the Attorney General
 One Granite Place South
 Concord, NH 03301
 Telephone: (603) 271-2678
 Email: Alexandra.c.sosnowski@doj.nh.gov
Counsel for Plaintiff State of New Hampshire

s/ Caleb J. Smith

Caleb J. Smith (admitted *pro hac vice*)
 Assistant Attorney General
 Consumer Protection Unit
 Office of the Oklahoma Attorney General
 15 West 6th Street, Suite 1000
 Tulsa, OK 74119
 Telephone: (918) 581-2230
 Email: caleb.smith@oag.ok.gov
Counsel for Plaintiff State of Oklahoma

s/ Timothy D. Smith

Timothy D. Smith, WSBA No. 44583
 Senior Assistant Attorney General
 Antitrust and False Claims Unit
 Oregon Department of Justice
 100 SW Market St
 Portland, OR 97201
 Telephone: (503) 934-4400
 Email: tim.smith@doj.state.or.us
Counsel for Plaintiff State of Oregon

s/ Jennifer A. Thomson

Jennifer A. Thomson (admitted *pro hac vice*)
 Senior Deputy Attorney General
 Pennsylvania Office of Attorney General
 Strawberry Square, 14th Floor
 Harrisburg, PA 17120
 Telephone: (717) 787-4530
 Email: jthomson@attorneygeneral.gov
Counsel for Plaintiff Commonwealth of Pennsylvania

s/ Michael A. Undorf

Michael A. Undorf (admitted *pro hac vice*)
 Deputy Attorney General
 Delaware Department of Justice
 820 N. French St., 5th Floor
 Wilmington, DE 19801
 Telephone: (302) 683-8816
 Email: michael.undorf@delaware.gov
Counsel for Plaintiff State of Delaware

s/ Christina M. Moylan

Christina M. Moylan (admitted *pro hac vice*)
 Assistant Attorney General
 Chief, Consumer Protection Division
 Office of the Maine Attorney General
 6 State House Station
 Augusta, ME 04333-0006
 Telephone: (207) 626-8800
 Email: christina.moylan@maine.gov
Counsel for Plaintiff State of Maine

s/ Gary Honick

Gary Honick (admitted *pro hac vice*)
 Assistant Attorney General
 Deputy Chief, Antitrust Division
 Office of the Maryland Attorney General
 200 St. Paul Place
 Baltimore, MD 21202
 Telephone: (410) 576-6474
 Email: Ghonick@oag.state.md.us
Counsel for Plaintiff State of Maryland

s/ Michael Mackenzie

Michael Mackenzie (admitted *pro hac vice*)
 Deputy Chief, Antitrust Division
 Office of the Massachusetts Attorney General
 One Ashburton Place, 18th Floor
 Boston, MA 02108
 Telephone: (617) 963-2369
 Email: michael.mackenzie@mass.gov
Counsel for Plaintiff Commonwealth of Massachusetts

s/ Scott A. Mertens

Scott A. Mertens (admitted *pro hac vice*)
 Assistant Attorney General
 Michigan Department of Attorney General
 525 West Ottawa Street
 Lansing, MI 48933
 Telephone: (517) 335-7622
 Email: MertensS@michigan.gov
Counsel for Plaintiff State of Michigan

s/ Zach Biesanz

Zach Biesanz (admitted *pro hac vice*)
 Senior Enforcement Counsel
 Office of the Minnesota Attorney General
 445 Minnesota Street, Suite 1400
 Saint Paul, MN 55101
 Telephone: (651) 757-1257
 Email: zach.biesanz@ag.state.mn.us
Counsel for Plaintiff State of Minnesota

s/ Lucas J. Tucker

Lucas J. Tucker (admitted *pro hac vice*)
 Senior Deputy Attorney General
 Office of the Nevada Attorney General
 100 N. Carson St.
 Carson City, NV 89701
 Telephone: (775) 684-1100
 Email: LTucker@ag.nv.gov
Counsel for Plaintiff State of Nevada

s/ Ana Atta-Alla

Ana Atta-Alla (admitted *pro hac vice*)
 Deputy Attorney General
 New Jersey Office of the Attorney General
 124 Halsey Street, 5th Floor
 Newark, NJ 07101
 Telephone: (973) 648-3070
 Email: Ana.Atta-Alla@law.njoag.gov
Counsel for Plaintiff State of New Jersey

s/ Jeffrey Herrera

Jeffrey Herrera (admitted *pro hac vice*)
 Assistant Attorney General
 New Mexico Office of the Attorney General
 408 Galisteo St.
 Santa Fe, NM 87501
 Telephone: (505) 490-4878
 Email: jherrera@nmag.gov
Counsel for Plaintiff State of New Mexico

s/ Zulma Carrasquillo-Almena

Zulma Carrasquillo (admitted *pro hac vice*)
 Assistant Attorney General
 Antitrust Division
 Puerto Rico Department of Justice
 P.O. Box 9020192
 San Juan, Puerto Rico 00901-0192
 Telephone: (787) 721-2900
 Email: zcarrasquillo@justicia.pr.gov
Counsel for Plaintiff Commonwealth of Puerto Rico

s/ Stephen N. Provazza

Stephen N. Provazza (admitted *pro hac vice*)
Special Assistant Attorney General
Chief, Consumer and Economic Justice Unit
Department of the Attorney General
150 South Main Street
Providence, RI 02903
Telephone: (401) 274-4400
Email: sprovazza@riag.ri.gov
Counsel for Plaintiff State of Rhode Island

s/ Sarah L.J. Aceves

Sarah L. J. Aceves (admitted *pro hac vice*)
Assistant Attorney General
Public Protection Division
Vermont Attorney General's Office
109 State Street
Montpelier, VT 05609
Telephone: (802) 828-3170
Email: sarah.aceves@vermont.gov
Counsel for Plaintiff State of Vermont

s/ Gwendolyn J. Cooley

Gwendolyn J. Cooley (admitted *pro hac vice*)
Assistant Attorney General
Wisconsin Department of Justice
Post Office Box 7857
Madison, WI 53707-7857
Telephone: (608) 261-5810
Email: cooleygj@doj.state.wi.us
Counsel for Plaintiff State of Wisconsin

MORGAN, LEWIS & BOCKIUS LLP

By: s/ Patty A. Eakes
Patty A. Eakes, WSBA #18888
Molly A. Terwilliger, WSBA #28449
1301 Second Avenue, Suite 2800
Seattle, WA 98101
Phone: (206) 274-6400
Email: patti.eakes@morganlewis.com
molly.terwilliger@morganlewis.com

WILLIAMS & CONNOLLY LLP

Heidi K. Hubbard (*pro hac vice*)
John E. Schmidlein (*pro hac vice*)
Kevin M. Hodges (*pro hac vice*)
Jonathan B. Pitt (*pro hac vice*)
Carl R. Metz (*pro hac vice*)
Carol J. Pruski (*pro hac vice*)
Katherine Trefz (*pro hac vice*)
680 Maine Avenue SW
Washington, DC 20024
Phone: (202) 434-5000
Email: hhubbard@wc.com
khodges@wc.com
jpitt@wc.com
cmetz@wc.com
cpruski@wc.com
ktrefz@wc.com

COVINGTON & BURLING LLP

Thomas O. Barnett (*pro hac vice*)
Katherine Mitchell-Tombras (*pro hac vice*)
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
Phone: (202) 662-5407
Email: tbarnett@cov.com
kmitchelltombras@cov.com

WILKINSON STEKLOFF LLP

Kosta S. Stojilkovic (*pro hac vice*)
2001 M Street NW, 10th Floor
Washington, DC 20036
Phone: (202) 847-4045
Email: kstojilkovic@wilkinsonstekloff.com

Attorneys for Defendant Amazon.com, Inc.

[PROPOSED] ORDER

IT IS SO ORDERED.

DATED this _____ day of _____, 2024.

JOHN H. CHUN
UNITED STATES DISTRICT JUDGE

Presented By:

s/ Kara King

SUSAN A. MUSSER (DC Bar # 1531486)
EDWARD H. TAKASHIMA (DC Bar # 1001641)
EMILY K. BOLLES (NY Reg. # 5408703)
KARA KING (DC Bar # 90004509)
ERIC ZEPP (NY Reg. #5538491)
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580
Tel.: (202) 326-2122 (Musser)
(202) 326-2464 (Takashima)
Email: smusser@ftc.gov
etakashima@ftc.gov
ebolles@ftc.gov
kking@ftc.gov
ezepp@ftc.gov

Attorneys for Plaintiff
Federal Trade Commission

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